

I, Special Agent Jason Kentros being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since June 2017. I am currently assigned to the FBI Boston Violent Crimes Task Force (VCTF), which is comprised of personnel of the FBI, Massachusetts State Police, and the Boston, Braintree, Malden, Saugus, Somerville, and Dedham Police Departments. As a Special Agent with the VCTF, I have repeatedly responded to incidents involving violent encounters. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation. I am aware that 18 U.S.C. § 2113 makes it a crime to take by force, violence, or intimidation, anything of value or belonging to banks, credit unions, or saving and loan institutions.
2. I submit this affidavit in support of an application for a warrant, pursuant to Rule 41(e)(2)(C) and 18 U.S.C. § 3117(a), authorizing agents of the FBI to surreptitiously install, monitor, repair, replace and use a real-time Global Positioning System (GPS) mobile tracking device for 45 days on the following motor vehicle located in the District of New Hampshire for the purpose of monitoring and recording data regarding the movement of this motor vehicle both inside and outside the District of New Hampshire and Massachusetts: 2020 Gray Hyundai Elantra, New Hampshire registration “1BYF57”, Vehicle Identification Number “5NPD84LF3LH626182” (the “SUBJECT VEHICLE”).
3. This application also requests, for the purpose of installing, maintaining, and/or removing the tracking device(s), authority to make covert entry into the parking lot adjacent to

1311 Hanover, Street, Manchester, New Hampshire, as further described in Attachment A, outside the daytime hours<sup>1</sup>.

4. I submit this in furtherance of an ongoing criminal investigation into violations of 18 U.S.C. § 2113 (Bank Robbery and Incidental Crimes), among other potential statutes, related to four commercial bank robberies that occurred at commercial banks located in the towns of Tewksbury, MA, on March 7, 2022, Danvers, MA, on March 19, 2022, Lee, NH, on March 29, 2022, and Tewksbury, MA, on March 30, 2022.
5. The statements in this affidavit are based on my own investigative efforts and on information provided to me by agents and police officers, including those who responded to the crime scenes discussed below; written reports about this and other investigations that I have received, either directly or indirectly, from other law enforcement agents; the results of surveillance conducted by law enforcement agents; and information provided by witnesses, including those who may be cooperating with me and other task force agents during this investigation.
6. Because this affidavit is submitted for the limited purpose of securing the requested warrant, I have not included every fact known to me concerning this investigation. Instead, I have set forth only those facts that I believe are necessary to establish probable cause for the requested warrant.
7. Based on my training and experience, I am familiar with many aspects of bank robberies and a bank robber's methods of operation, including pre-robbery surveillance, how armed

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<sup>1</sup> The SUBJECT VEHICLE has been observed parked within the communal parking area adjacent to the 1311 Hanover Street, Manchester, NH, address. Following the March 30, 2022, Tewksbury Bank robbery, Law Enforcement personnel observed the SUBJECT VEHICLE parked in the adjacent parking lot. The 1311 Hanover Street address is registered address of Eric MOHAN, as identified Massachusetts State Police databases, who is the registered renter of the SUBJECT VEHICLE.

robbers interact with bank employees and other personnel within a bank, and methods of arriving at and escaping from a bank after a robbery. I am also familiar with the manner in which bank robbers use personal and rented cars and trucks, and a variety of other motor vehicles, to: (a) meet with co-conspirators; (b) arrive at, and escape from, a bank robbery; and (c) store and transport the proceeds and other evidence of the commission of the crime of a bank robbery.

8. Based on my training and experience, bank robbers typically utilize motor vehicles during the commission of the crime, and for surveillance prior to the commission of the crime. Consequently, the location of vehicles used by bank robbers and those working with them can be instrumental to tracking their movements prior to and following a bank robbery.
9. In particular, based upon my training and experience, tracking motor vehicles used in bank robberies leads to evidence of, among other things:
  - a. The identification of potential criminal associates, such as criminal co-conspirators;
  - b. The identification of physical locations where evidence of armed robberies is offloaded or stored, including residences, businesses, commercial storage facilities, warehouses, and ports; and
  - c. The identification of physical locations where proceeds of armed robberies are stored, deposited, concealed, used in monetary and financial transactions, and laundered, including private businesses, banks, wire-remitter businesses, and other financial institutions.

10. Based on my training and experience, tracking motor vehicles used in bank robberies often corroborates and verifies other information and leads derived from other investigative techniques, including informants, wiretaps, and visual surveillance.

### **THE ROBBERIES**

11. On March 7, 2022, March 19, 2022, March 29, 2022, March 30, 2022, the towns of Tewksbury, MA, Danvers, MA, Lee, NH, and Tewksbury, MA, all experienced bank robberies by an individual matching a similar description. In all four robberies, the subject was described as a white male, wearing a surgical mask, hat, gloves, and glasses. In three of the robberies the subject was wearing an article of clothing depicting a New England Patriots logo. In three of the incidents, the subject was alleged to have been wearing black leather gloves. In all of the incidents, the subject carried a bag which he deposited the stolen money into.

### **March 7, 2022, Salem Five Bank, 2171 Main St, Tewksbury, MA**

12. On March 7, 2022, at approximately 1:30 p.m., a white male, approximately 5'11", wearing an adidas baseball cap, surgical mask, glasses, black jacket and blue jeans, and wearing black leather gloves, entered the Salem Five Bank, 2171 Main St., Tewksbury, MA, and robbed it. The subject began to ask the teller about rates on a checking account before handing the teller a note which stated that someone was watching the building. The subject instructed the teller to "keep your hands where I can see them". The teller then began to put money into the bag that the subject was carrying. Video footage provided to Police by a nearby residential business depicted an individual matching the robbers' appearance walking towards the bank just prior to the robbery and running away

from the bank up March Road shortly after the robbery. The suspect stole approximately \$8,000.00 in U.S. currency.

**March 19, 2022, Align Credit Union, 110 Newbury, St, Danvers, MA**

13. On March 19, 2022, at approximately 9:52 a.m., a white male, wearing a New England Patriots baseball cap, surgical mask, glasses, and black leather gloves, entered the Align Credit Union, 110 Newbury, St, Danvers, MA, and robbed it. The subject approached a bank teller and inquired about loans. The suspect spoke with the bank manager for approximately fifteen minutes before handing the manager a note requesting “all the money”. The suspect then handed the bank manager a plastic bag and instructed him to put the money into the bag. The manager then put the money into the bag at which point the suspect informs the tellers to put their hands up, informs them that this was a robbery, and to wait fifteen minutes. The suspect stole approximately \$7,613.00 in U.S. currency.

**March 29, 2022, North East Credit Union, 145 Calef HWY, Lee, NH**

14. On March 29, 2022, at approximately 10:53 a.m., a white male, wearing a baseball cap, jacket with New England Patriots logo, surgical mask, dark trimmed glasses, dark leather gloves, entered the bank and robbed it. The suspect approached the teller station and stated he was new to the area and inquired about opening a bank account. The teller then asked the suspect for an identification at which point he produced a note which informed the teller that this was a holdup, and that he (the suspect) was armed and would inflict harm upon the teller. The suspect demanded money and instructed the teller to keep her hands where he could see them. The suspect placed the money into a dark color plastic shopping bag. The suspect stole approximately \$6,000.00 in U.S. currency.

**March 30, 2022, Salem Five Bank, 2171 Main St, Tewksbury, MA**

15. On March 30, 2022, at approximately 3:23 p.m., a white male, wearing a New England Patriots cap, mask, sunglasses, leather gloves, entered the bank Salem Five Bank, 2171 Main St, Tewksbury, MA, and robbed it. The suspect entered the bank, approached the teller station. Upon approaching the teller station, the robber handed the teller a black plastic bag and stated “you know the drill”. The suspect further stated that he had a firearm and instructed the tellers to keep their hands where he, the suspect, could see them. An eyewitness to the robbery stated that, prior to the robbery, she saw the suspect walk down March Road, and enter the bank. A few moments later, that same eyewitness observed the suspect exit the bank, and run back up March Road. The suspect stole approximately \$2,000.00 in U.S. currency.

**Identification of SUBJECT VEHICLE**

16. Following the Tewksbury robbery that occurred on March 30, 2022, Tewksbury Police began to canvas homes within the vicinity of March Road for home camera systems that may have captured the SUBJECT VEHICLE. Tewksbury Police were able to identify a home on March Road that had a home camera system which captured March Road. Tewksbury Police reviewed the footage and identified a gray Hyundai Elantra driving down March Road in the direction of the bank at approximately 3:00 p.m. Following the robbery at the bank which occurred at approximately 3:18 p.m., a gray Hyundai Elantra is seen driving back down March Road, away from the bank, at approximately 3:20 p.m.

17. Tewksbury Police conducted a query of their Flock Camera system<sup>2</sup> to identify any vehicles matching the description of the above-mentioned vehicle within the town of

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<sup>2</sup> FlockOS is a private company which offers camera capable of identifying and reading license plate data for commercial, business, and law enforcement purposes.

Tewksbury during the date and time of the robbery. A Flock camera within the vicinity of East Street, Tewksbury, MA<sup>3</sup>, captured a Gray Hyundai Elantra, New Hampshire registration “1BYF57” (SUBJECT VEHICLE) at approximately 2:49 p.m. That same Flock camera also captured the SUBJECT VEHICLE on East Street in Tewksbury, MA, at approximately 12:34 p.m. on March 7, 2022, nearly an hour before the robbery. Those are the only two dates that Flock camera have identified the SUBJECT VEHICLE within the city of Tewksbury, MA.

18. The SUBJECT VEHICLE information was then shared with Danvers Police. Danvers Police confirmed that a License Plate Reader on a Danvers Police identified the SUBJECT VEHICLE within the vicinity of 110 Newbury Street, On March 19, 2022, within minutes of the robbery.

19. The vehicle was identified as being registered to EAN Holdings. EAN is the parent company of Enterprise Rent-A-Car (ENTERPRISE). ENTERPRISE informed Tewksbury Police that the car was currently rented by Eric MOHAN (“MOHAN”) XX/XX/1974. MOHAN is a Caucasian male<sup>4</sup>. ENTERPRISE personnel confirmed with FBI Boston that MOHAN was the individual who rented the vehicle and that he rents vehicles for long periods of time. MOHAN’s criminal history includes operating under the influence, check forgery, and larceny.

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<sup>3</sup> The East Street address is approximately 2.5 miles from the Salem Five bank located at 2171 Main Street, Tewksbury, MA.

<sup>4</sup> Comparing photographs of MOHAN to the Suspect is difficult because in all instances, the suspect wore a hat, sunglasses, and mask in all robberies. It should be noted that MOHAN is depicted in his Massachusetts RMV photograph as being bald, whereas the suspect had long black hair. However, through my training and experience I know that bank robbers will often use wigs and other disguises to hide their true identity. Law Enforcement personnel and a victim teller have also stated in their police reports that they believed, through their review of bank surveillance footage, that the suspect was wearing a wig.

20. Following the robbery on March 30, 2022, members of FBI Boston responded to the known address of MOHAN, 1311 Hanover Street, Unit 14, Manchester, NH, and observed the SUBJECT VEHICLE within the common area parking space. MOHAN was observed exiting the apartment building, walking over to the SUBJECT VEHICLE, and looking around the area before re-entering his building.
21. Based on my training and experience, I believe the Gray Hyundai Elantra depicted in the home camera footage from March Road just prior to, and immediately following the robbery, is the same vehicle as the SUBJECT VEHICLE captured by Flock and Danvers Police cameras within vicinity of each of the robbed banks during the same general time and date of the robberies.
22. Based on the foregoing, there is probable cause to believe that the SUBJECT VEHICLE was used in the aforementioned bank robberies, as described above, and is an instrumentality of the crimes described above. In addition, based on my training and experience with bank robberies, like those described above, I have reason to believe that the suspect will continue to participate in bank robberies in the future. Tracking the SUBJECT VEHICLE will assist law enforcement both in attempting to obtain evidence of the robberies, including attempting to identify participants in the robberies, and help law enforcement attempt to thwart further robberies.
23. Accordingly, I believe that tracking information related to the SUBJECT VEHICLE will likely lead to:
- a. the identification of suspect(s) who have committed, are committing, or will continue to commit violations of one or more criminal statutes, including 18 U.S.C. § 1951(a);



- b. the identification of potential criminal associates;
  - c. the identification of locations where robbery proceeds are stored, deposited, concealed, used in monetary and financial transactions and laundered; and
  - d. evidence that the SUBJECT VEHICLE is being used to facilitate ongoing illegal activities in the District of Massachusetts.
24. The data obtained from the GPS device about the geographic location of the SUBJECT VEHICLE will likely constitute or lead to evidence, fruits, and instrumentalities of the aforementioned crimes as well as to the identification of individuals who are engaged in the commission of those and related crimes.

#### **Authorization Request**

25. The United States requests that the Court issue a warrant authorizing members of FBI, or their authorized representatives, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to: (i) install a tracking device in or on the SUBJECT VEHICLE within the District of New Hampshire within 10 calendar days of the warrant issuance, and to repair, replace, maintain and remove said tracking device from the subject vehicle after the use of the tracking device has ended; (ii) surreptitiously enter the location described on Attachment A to effect the tracking device's installation, repair, replacement, and removal; (iii) move the SUBJECT VEHICLE to effect the tracking devices installation, repair, replacement, and removal; and (iv) monitor the tracking device for a period of 45 days following the warrants issuance. To ensure the safety of the executing officer and to avoid premature disclosure of the investigation, the United States further requests the Court authorize installations,

replacement, maintenance and removal of the tracking device during both daytime and nighttime hours.

26. Because there is reasonable cause to believe that providing immediate notification would seriously jeopardize the ongoing investigation, the United States also requests that the warrant delay notification of the execution of the warrant for a period not to exceed 30 days after the end of the authorized period of tracking (including any extensions thereof), in accordance with 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3).

**Conclusion**

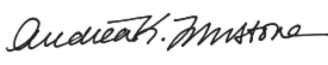
27. WHEREFORE, I submit that there is probable cause to believe that: (a) criminal violations of 18 U.S.C. § 2113, among other statutes, have occurred, and may continue to occur; (b) the SUBJECT VEHICLE is being used to facilitate the bank robberies in the District of Massachusetts and New Hampshire; and (c) the data obtained from the GPS device about the geographic location of the SUBJECT VEHICLE will likely constitute or lead to evidence, fruits, and instrumentalities of the aforementioned crimes as well as to the identification of individuals who are engaged in the commission of those and related crimes.

/s/ Jason Kentros  
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Jason Kentros  
Special Agent, FBI

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

Date: **Mar 31, 2022**

Time: **4:39 PM, Mar 31, 2022**

  
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Hon. Andrea K. Johnstone  
United States Magistrate Judge



### ATTACHMENT A

The parking lot adjacent to 1311 Hanover Street, Manchester, New Hampshire, as depicted in the below image obtained from Bing maps. The residential property at 1311 Hanover Street appears to be a large residential apartment building, with a large capacity parking lot to left and right side of the building. The parking lot can be accessed from Candia Road. The SUSPECT VEHICLE was observed parked On March 30, 2022, within the vicinity of the yellow highlighted section of the parking area depicted below.

